

**Staff Consideration of Public Comments Received on the
Draft Implementation Plan (revision 2.0)**

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1. Introduction

ICANN posted revision 2.0 of the Draft Implementation Plan for the IDN ccTLD Fast Track Process on 18 February 2009. The IDN Fast Track Process is a mechanism recommended by the [IDNC Working Group](#), focused on the introduction of a limited number of non contentious IDN ccTLDs, associated with the ISO 3166-1 two-letter codes, to meet near term demand, while an overall IDN ccTLD policy is being developed.

The plan was posted for public comments, until 6 April 2009. All received comments can be found in the archive at: <http://forum.icann.org/lists/ft-implementation/>

In total 16 comments were received in this round. Five (5) of these comments were not relevant (spam). One comment was submitted two times.

In this paper an overview of the received comments and the associated staff analysis and consideration of the comment is provided per Module of the Implementation Plan. In the first part of a section the relevant text of the Implementation Plan and associated topic paper (if applicable) is included. The second part of the substantive sections of this paper contains the comments (summarized) and staff consideration of the comment.

Section 2 of this overview contains the comments and staff considerations of these comments relating to general aspects of and topics that do not relate to a specific Module in the Draft Implementation Plan.

Section 3 includes the received comments related to the Documentation of Responsibilities. This is followed by Section 4 covering comments relating to the financial contribution of IDN ccTLD managers to ICANN. Section 5 covers the comments relating to IDN Tables and variant management topic.

To provide a full overview of the received comments and the staff considerations thereof, the relevant sections of the GAC communiqué of 4 March and the ccNSO Council resolution are included in this paper. It should be noted that although the GAC communiqué refers to version 1.0 of the draft Implementation Plan, the comments are considered relevant in the context of version 2 of the Plan, and are therefore included here.

2. General Comments

In this section the submitted comments are included and summarized which are not related to any specific section in the draft Implementation Plan or one of the related topic papers.

Comments and Staff considerations

| Nr | Name and Affiliation | Date | Comment | Staff Consideration |
|-----------|---|-------------|---|--|
| 1 | Claudio DiGangi, INTA | 6 April | ICANN should recommend the use of a Dispute Resolution Provider to resolve disputes arising from registration under the IDN ccTLD | The manner in which disputes, arising from registrations under the IDN ccTLD, are resolved is a local matter. It is in the remit of, and should be determined by, the IDN ccTLD manager and its local internet community, including the relevant public authority. |
| 2 | Naveed-ul-Haq | 3 April | Elaborate on the probable duration for the three-stage methodology | As the process is getting closer to being finalized ICANN will review possible time estimate for the methodology. However, the duration of the three-stage methodology depends on multiple factors, which are beyond the control of ICANN or the requestor. |
| 3 | See # 2 | | As part of the RFI, ICANN has asked countries to estimate the timeframe when they expected to conclude their preparation. Does this reflect preparation stage as per the module 5 of the draft Implementation plan? | The RFI respondents indicated timeframe may vary from respondent to respondent. Overall the intention was for ICANN to get an overview or estimate on the volume of requests for IDN ccTLDs requests. It is anticipated that several respondents indicated the time they were ready to enter the Fast Track process, although others indicated the time they would be ready to launch the IDN ccTLD. |
| 4 | Paul Szyndler, .au Domain Administration | 6 April | In order to meet the Seoul meeting timeframe, ICANN staff should | Comment noted. In the third revision of the draft Implementation Plan more |

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| | | | endeavour to finalise outstanding details, including information on “meaningfulness” requirements, and the finalised structure and role of the DNS Stability Technical Panel. | details will be provided. |
| 5 | Avri Doria, Chair of the GNSO Council | 6 April | <p>Re-iteration of resolution of GNSO Council January 2009:</p> <ul style="list-style-type: none"> - neither the New gTLD or ccTLD fast track process should result in IDN TLDs in the root before the other unless both the GNSO and ccNSO so agree; - fast track IDN ccTLDs should not be entered into the root if they do not have enforceable commitments on security and stability and pay ICANN sufficient fees. <p>Resolution furthers earlier position of the GNSO, that the introduction of IDN gTLDs or IDN ccTLDs should not be delayed because of lack of readiness of one category. However if they are not introduced at the same time, steps should be taken so that neither category is advantaged or disadvantaged.</p> | <p>As has been stated by many in the community, the ideal scenario would be for the IDN ccTLD Fast Track Process and the gTLD program to launch at the same time. Input received from the GNSO, ccNSO, and others reflect this goal. While it is important to coordinate these two efforts, it is also determined that one process should not be delayed due to delays in the other. That course has been pursued when it appeared as though the IDN ccTLD Fast Track Process may lag behind the gTLD process. Now, it appears that the IDN ccTLD Fast Track Process may launch first, a few months ahead of the gTLD implementation. Balancing the benefits and harms associated with moving ahead with IDN ccTLDs ahead of gTLDs, the original course appears to be sound – that each process will launch as soon as it is ready. Many countries are ready to move ahead with their community based IDN. Delaying that process would only serve to deprive registrants in those areas of participating in the DNS in their own language and also encourage those waiting for the ICANN process to launch their own version of the root zone.</p> |

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| 6 | Cheryl Langdon Orr, Chair of the ALAC | 15 April | Provide information on launching date of the Fast Track process. Information is critical for user community | See # 5 |
| 7 | See # 6 | | Implementation Plan does not specify whether IDN ccTLD registries are required to take any preventive or transitional measures to protect the legitimate interests of the existing individual registrants under the relevant ccTLDs. These measures are essential for existing individual registrants | Although the concern expressed is considered relevant, whether or not an IDN ccTLD registry will take any preventive or transitional measures to protect the legitimate interests of the existing individual registrants under the relevant ccTLDs, is a local matter. See also # 1 |
| 8 | See # 6 | | The user communities welcome strengthening competition in the IDN ccTLD registration market provided that the IANA process is properly followed and stability and security are ensured in the relevant name space. | Comment noted. The current IANA processes and practices for delegation of a ccTLD are followed and will not be changed as part of the Fast Track Process. Ensuring the stability and security is one of the overarching principles that guide the implementation efforts |
| 9 | See # 6 | | Presently, some ccTLD registries have already been supportive to the local user organizations in various ways. The launch of IDN ccTLDs opens up new opportunities for both communities to cooperate. | Comment noted. |

3. Staff Considerations on Comments Concerning the Proposed Implementation Details Regarding the Documentation of Responsibilities

Draft Implementation Plan, Section 7.1 Relationship between ICANN and IDN ccTLD Manager:

The IDNC WG Final Report does not cover the relationship between ICANN and the IDN ccTLD manager after delegation of the IDN ccTLD(s). However, the nature of such relationship was considered extensively in the comments received and concerns raised in the IDNC Final Report.

Therefore the need, and possible mechanisms, to formalize the relationship between ICANN and the IDN ccTLD manager has been considered part of the Draft Implementation Plan.

Since ccTLDs were introduced, the circumstances and environment have changed considerably. This includes an increasing demand for transparency and accountability, increased need to ensure the security and stability of the Internet for the benefit of the local and global community, and demand to delineate the roles and responsibilities of the entities involved in the function of the DNS.

The introduction of IDN ccTLDs will require that a number of additional technical aspects are taken into account to ensure the security, stability and resilience of the Domain Name System. In particular it will be necessary to ensure that the IDN ccTLD manager adheres to the IDNA protocol and IDN guidelines on an ongoing basis and until a full PDP process can be completed for IDN ccTLDs.

ICANN staff sought input and guidance from the community to develop a formal arrangement that included a general description of responsibilities for both ICANN and IDN ccTLD managers. This community input indicated that there should at least be a mechanism to ensure that all IDN ccTLD managers adhere to the IDNA protocol over time and comply with associated standards, guidelines and other standards as they develop.

The Draft Fast Track Implementation Plan proposes a “Documentation of Responsibilities” (DoR) between the IDN ccTLD manager and ICANN.

Draft Implementation Plan for the IDN ccTLD Fast Track Process

The DoR is intended to document the roles and responsibilities of both the IDN ccTLD manager and ICANN, particularly to ensure adherence with the relevant standards and guidelines during the phase of the fast track deployment and pending the conclusion of the IDN ccPDP (Policy Development Process for the longer term introduction of IDN ccTLDs).

A separate paper entitled “Documentation of Responsibilities between ICANN and prospective IDN ccTLD managers” provides more detail on this issue and includes a draft DoR for consideration.

Comments are sought on the various elements in the proposed Documentation of Responsibilities.

Proposed Implementation Details Regarding Documentation of Responsibilities

1. Need for a formal arrangement

As part of the planning for the implementation of the Fast Track process, ICANN has evaluated its current program to achieve stable agreements with country code top-level domain managers. Currently, ICANN is meeting this responsibility with its ongoing programme of voluntary Accountability Frameworks (AF).

Since ccTLDs were introduced the circumstances and environment have changed considerably. This includes an increasing demand for transparency and accountability, increased need to ensure the security and stability of the Internet for the benefit of the local and global community, and demand to delineate the roles and responsibilities of the entities involved in the function of the DNS.

The introduction of IDN ccTLDs will require that a number of additional technical aspects are taken into account to ensure the security, stability and resilience of the Domain Name System. In particular it will be necessary to ensure that the IDN ccTLD manager adheres to the IDNA protocol and IDN guidelines on an ongoing basis and until a full PDP process can be completed for IDN ccTLDs.

The introduction of IDN ccTLDs under the Fast Track process is closely associated with the global IDN program, which also includes the introduction of IDN generic TLDs. This program is also developed through ICANN's bottom-up multi-stakeholder processes and in close cooperation with the technical community.

As part of this early introduction of IDNs, it is required that some of the technical and operational aspects are accounted for to ensure the security, stability and interoperability of the Domain Name System. As noted previously, this is evident in the IDNC WG report and documented further in a note from Tina Dam, ICANN's IDN Program Director to Mr. Janis Karklins, chair of the GAC and Mr. Chris Disspain, chair of the ccNSO, included as Annex B. In this context it will be necessary to ensure that the IDN ccTLD manager complies with the IDNA protocol and the IDN guidelines on an ongoing basis.

Taking into account ICANN's mission to ensure the security, stability and interoperability of the DNS, the new technical environment and conditions associated with the introduction of IDNs and the relevant technical operational requirements, the Fast Track Implementation Plan proposes a "DoR" between the IDN ccTLD manager and ICANN.

The DoR is intended to document the roles and responsibilities of both the IDN ccTLD manager and ICANN, particularly to ensure adherence to the relevant standards and guidelines during the phase of Fast Track deployment and pending the conclusion of the IDN ccPDP (Policy Development Process for the longer term introduction of IDN ccTLDs, see <http://ccnso.icann.org/workinggroups/idn-pdp-process-time-table-02dec08.htm> for more information).

Consistent with current ccTLD practices, the IDN ccTLD manager will be responsible for developing and setting policies associated with the operation of the IDN ccTLD in accordance

with national laws. The IDN ccTLD manager will not be required to abide by ICANN's consensus policies.

Comments and Staff Considerations:

| Nr | Name and Affiliation | Date | Comment | Staff Consideration |
|----|----------------------|---------|---|--|
| 1 | GAC communiqué | 4 March | IDN ccTLDs should be similarly treated as ASCII ccTLDs | Stating that IDN ccTLDs are similar to ASCII ccTLDs pre-empt the outcome of the IDN ccPDP, and does not take into consideration that IDN ccTLDs are created through the ICANN processes, in a different environment and under different circumstances than ASCII ccTLDs, and that the introduction is experimental in nature |
| 2 | See # 1 | | GAC emphasizes that it is primarily for the local Internet community, including the relevant government or public authority, to determine the manner in which a string should be selected, the manner in which a registry operator should be selected and the registry policy that should apply for the selected IDN ccTLD. | The draft Implementation Plan including the proposed DoR, reflect and clarify this underlying principle. The starting point of the DoR is to delineate and describe the roles and responsibilities of the IDN ccTLD manager and ICANN on the basis of this underlying principles. |
| 3 | See # 1 | | A documented relationship between ICANN and IDN ccTLD operators should be kept voluntary. A documented relationship on the basis of the proposed "Documentation of Responsibilities", either as it stands today or in a modified format, may be encouraged but should | One of the overarching requirements for the introduction of IDN ccTLDs was and remains ensuring the security, stability and interoperability of the DNS. As identified by the IDNC WG, the introduction of IDN ccTLDs under the Fast Track is experimental in |

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| | | | not be a condition for IDN ccTLD delegations. | <p>nature. For these reasons, compliance with technical standards, including the IDNA protocol and IDN guidelines is needed. To achieve these goals in a transparent way for the local and global Internet communities and delineate the associated accountabilities, it is considered appropriate that the selected IDN ccTLD manager and ICANN both acknowledge and recognise each other's future roles and responsibilities, and take on a number of commitments associated with and limited to the responsibilities.</p> <p>The topic of legal arrangements is under further consideration and will be further discussed in a topic paper prepared by staff for this purpose. The topic paper will be published in time for the Sydney meeting in association with the next version of the draft Implementation Plan.</p> |
| 4 | See # 1 | | As it has always been the case, it's in the best interest of IDN ccTLD operators and the entire IDN community to adhere to all relevant IETF standards including IDNA protocol, IDN Guidelines and commit to complying with future protocol updates. | See # 3 |
| 5 | ccNSO Council Resolution | 4 March | IDN ccTLDs should be treated similarly to ASCII | See # 1 and 2 |

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| | | | ccTLDs and so entering into of a documented relationship between ICANN and an IDN ccTLD manager should be voluntary and not a requirement for the delegation of the IDN ccTLD. However such a documented relationship should be encouraged | |
| 6 | See # 5 | | It is in the best interest of IDN ccTLDs managers and the entire DNS community to adhere to all relevant IETF standards (including the IDNA protocol) and the IDN Guidelines and to commit to complying with future IDNA protocol updates. | See # 3 |
| 7 | Paul Szyndler, .au Domain Administration | 6 April | auDA recognises the desirability of agreements as proposed between ICANN and IDN ccTLD managers. They should be encouraged. The failure of ICANN and an IDN ccTLD manager to enter into a formal documented relationship should not prevent the delegation of the relevant IDN ccTLD. | See # 3 |
| 8 | See #7 | | The D-o-R as proposed, provides an appropriate template for ICANN-IDN ccTLD agreements. | Comment noted |
| 9 | Avri Doria Chair, GNSO Council | 6 April | Identification of: 1) the need for mechanisms to formalize the relationship between ICANN and the IDN ccTLD manager; 2) the fact that the circumstances and environment has changed | See # 3 |

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| | | | <p>considerably since the original introduction of the ccTLDs; 3) the need to ensure the security and stability of the Internet has increased; and, 4) the fact that the introduction of IDN ccTLDs will require that a number of additional technical aspects are taken into account, in particular to ensure that the IDN ccTLD manager adheres to the IDNA protocol and IDN guidelines on an ongoing basis.</p> | |
| 10 | See # 9 | | <p>GNSO resolution reiterated that fast track IDN ccTLDs should not be entered into the root if they do not have an enforceable commitment to follow security and stability requirements such as those contained in gTLD Registry contracts, IDN Guidelines and IDN standards;</p> | <p>As has been stated by many in the community, the ideal scenario would be for the IDN ccTLD Fast Track Process and the gTLD program to launch at the same time. Input received from the GNSO, ccNSO, and others reflect this goal. While it is important to coordinate these two efforts, it is also determined that one process should not be delayed due to delays in the other. That course has been pursued when it appeared as though the IDN ccTLD Fast Track Process may lag behind the gTLD process. Now, it appears that the IDN ccTLD Fast Track Process may launch first, a few months ahead of the gTLD implementation. Balancing the benefits and harms associated with moving ahead with IDN ccTLDs ahead of gTLDs, the original course appears to be sound – that each process will launch as soon as it is ready. Many countries are ready to move</p> |

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| | | | | ahead with their community based IDN. Delaying that process would only serve to deprive registrants in those areas of participating in the DNS in their own language and also encourage those waiting for the ICANN process to launch their own version of the root zone. |
| 11 | Abdulaziz H. Al-Zoman, SaudiNIC, CITC | 7 April | The delegation of IDN ccTLDs is viewed to be similar as existing ccTLDs - they are for the local communities to operate for their own communities use. Mandatory agreements between ICANN and IDN ccTLD operator should not be made a condition for IDN ccTLDs delegation. Voluntary, documented relationship should be available between the IDN ccTLD Operator and ICANN - just as it is available to existing ccTLDs | See # 1 and 2 |
| 12 | See # 11 | | For those operators who, for whatever reason, do not want to exchange documents with ICANN, a commitment to the stability and security of the Internet, including compliance with the IDNA Guidelines and Protocols, should be sufficient. | Comment noted and see # 3 |
| 13 | Cheryl Langdon Orr, Chair of the ALAC | 15 April | Clauses on community services of IDN ccTLD to local community should be incorporated and enforced in the IDN ccTLD delegation agreements. | Whether and to what extent an IDN ccTLD manager will provide community services as suggested by its local community is a local matter, and for that reason is in the remit of and should be determined by the IDN ccTLD manager and its local internet |

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| | | | | community, including the relevant public authority. |
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4. Staff Considerations on Comments Concerning Proposed Financial Contributions

Draft Implementation Plan, Section 7.2 Financial Contributions:

The IDNC WG Final Report contains no recommendation about possible financial contributions for implementing IDN ccTLDs. The community discussed this topic and various viewpoints were put forward proposing establishment of financial contributions.

ICANN is looking forward to continuing this dialogue with the community, and to receiving feedback so that a resolution can be reached on this topic in a timely manner. While working toward resolution, there are some preliminary statements that can be made regarding financial contributions in general.

As a not-for-profit organization, ICANN strives for fair and equitable cost recovery to fund its services, seeking appropriate frameworks to recover costs from the communities it serves. The principle of fair and equitable cost recovery is also applicable when ICANN develops new services. With new services come new costs; the only question is the manner in which those costs are funded. Should the costs of new services be absorbed by current ICANN contributions, or should beneficiaries of new services pay for them? In certain cases, it was decided that new programs must be fully self-funded, most notably, the New gTLD Program. In other cases, new services are funded through ICANN's regular budget process; for example, ICANN's DNSSEC work.

Formal and informal feedback on required contributions by IDN ccTLD managers is divided. Some point to ccTLDs predating ICANN, and that the existing model of voluntary contributions for ASCII ccTLDs should be extended to new IDN ccTLDs. Others note that IDN ccTLDs are new entities not covered by existing country code policy, and that their funding should come from the managers of these new TLD registries. This is a financial issue in that new costs will certainly be incurred for the

These costs must be funded, and this is an issue that touches on the relationships between the new IDN ccTLD registries and ICANN.

While parallels can be drawn between current ccTLD managers and potential IDN ccTLD managers, it should be recognized that the circumstances and environment have changed since ccTLDs were first introduced into the DNS. There is an increasing demand for transparency and accountability, an increased need to ensure the security and stability of the Internet for the benefit of the local and global community, and demand to delineate the roles and responsibilities of the entities involved in the function of the DNS.

Given that the Fast Track program is a new program created specifically for new IDN ccTLD managers and their Internet users, some contribution should be required from IDN ccTLD managers to offset its program costs. Still, this remains a Module 7 discussion issue in this Implementation Plan draft because more discussion is required before finalizing recommendations on contributions, including feedback on required contributions, the cost components and levels that should be considered in a cost recovery mechanism, how contribution levels might be set, and possible exceptions to required contributions.

Comments and Staff Considerations:

| Nr. | Name and Affiliation | Date | Comment | Staff Consideration |
|-----|----------------------|--------------------|---|--|
| 1 | GAC communiqué | 4 March 2009 | IDN ccTLDs should be similarly treated as ASCII ccTLDs | To the extent IDN ccTLD are similar to ASCII ccTLDs, they will be treated similarly. However stating that IDN ccTLDs are similar to ASCII ccTLDs pre-empt the outcome of the IDN ccPDP, and does not take into consideration that ASCII ccTLDs are created through the ICANN processes. |
| 2 | See # 1 | | Financial contributions should be calculated on a cost recovery basis. Full disclosure and breakdown of the costs involved in the IDN program would be desirable for better understanding of possible cost recovery models. Further information, from ICANN staff, on the different possible cost recovery mechanisms and concrete proposals would help advance positions on the subject. | ICANN, as a not-for-profit organization, is committed to the basic principle of fair and equitable cost recovery from the communities to which it provides services. By fair and equitable one should understand that ICANN must consider many factors in establishing cost recovery frameworks for its services. ICANN staff will provide several papers analysing the costs relating to IDN ccTLDs. The papers will be available in advance of the ICANN Sydney meeting. |

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| 3 | See #1 | | Financial contributions should be kept voluntary and should not be a condition for IDN ccTLD delegations | See # 1 |
| 4 | ccNSO Council Resolution | 4 March | IDN ccTLDs should be treated similarly to ASCII ccTLDs and so financial contributions should be voluntary and should not be a requirement for the delegation of an IDN ccTLD. Detailed information from ICANN on the breakdown of the costs involved in the IDN ccTLD Fast Track programme (and other costs ICANN incurs related to ccTLDs) would be welcome and help advance discussions. Concrete proposals on possible financial contribution models would also help to advance discussions | See # 1, 2 and 3 |
| 5 | Naveed-ul-Haq, Pakistan Telecommunication Authority | 3 April | Request to highlight cost to be paid by the applicant in next draft Implementation Plan. Developing countries generally have a tight ICT budget, a general fee idea may help them in planning the associated cost in a better way. | See # 2 |
| 6 | Paul Szyndler, .au Domain Administration | 6 April | auDA recognises the need for ICANN – as a not-for-profit body – to recover costs associated with the introduction of IDN ccTLDs. As such, it is | Comment noted. See also # 2 |

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| | | | <p>appropriate for IDN ccTLD managers to make financial contributions towards ICANN's operations. However, it is impossible to develop a reasonable model for contributions until all stakeholders possess a clear understanding of the costs involved with the IDN ccTLD Fast Track programme. ICANN staff to provide:</p> <ul style="list-style-type: none"> · a breakdown of the costs involved in introducing IDN ccTLDs; · detail on other costs ICANN incurs in relation to ccTLDs; and · concrete proposals on possible financial contribution models based on these costs. | |
| 7 | <p>Avri Doria Chair, GNSO Council</p> | 6 April | <p>Recognition of fair and equitable cost recovery mechanism for new services provided by ICANN forms a good basis for considering financial contributions for implementing the IDN ccTLD Fast Track process.</p> | <p>Comment noted. See also # 2</p> |
| 8 | <p>See # 7</p> | | <p>Reiteration of the resolution of the GNSO Council that fast track IDN ccTLDs should not be entered into the root if they do not have an</p> | <p>As has been stated by many in the community, the ideal scenario would be for the IDN ccTLD Fast Track Process and the gTLD program to launch at the same time. Input</p> |

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| | | | <p>enforceable commitment to pay ICANN fees sufficient to ensure that IDN ccTLDs are fully self-funding and are not cross-subsidized by other ICANN activities.</p> | <p>received from the GNSO, ccNSO, and others reflect this goal. While it is important to coordinate these two efforts, it is also determined that one process should not be delayed due to delays in the other. That course has been pursued when it appeared as though the IDN ccTLD Fast Track Process may lag behind the gTLD process. Now, it appears that the IDN ccTLD Fast Track Process may launch first, a few months ahead of the gTLD implementation. Balancing the benefits and harms associated with moving ahead with IDN ccTLDs ahead of gTLDs, the original course appears to be sound – that each process will launch as soon as it is ready. Many countries are ready to move ahead with their community based IDN. Delaying that process would only serve to deprive registrants in those areas of participating in the DNS in their own language and also encourage those waiting for the ICANN process to launch their own version of the root zone.</p> |
| 9 | Cheryl Langdon Orr, Chair of the ALAC | 15 April | The ICANN centralized funding model for public participation is becoming a bottleneck for enhancement of public participation. In | Comment noted. |

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| | | | contract, the localized distributive funding model through IDN ccTLDs would improve efficiency through linking up ICANN with its different constituencies and ensure the sustainability of the resources. | |
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5. Staff Considerations on Comments Concerning the Proposed Implementation Details regarding IDN Table and Variant Management

Draft Implementation Plan, section 7.5, IDN Tables and Variant Management:

An IDN Table is a list of all those characters that a particular TLD registry supports beyond the twenty-six letters of the basic Latin alphabet (a-z), ten digits (0-9), and the hyphen (-). If any characters in a table are considered to be variants of each other (essentially meaning “the same as”), this is indicated next to each character in a variant group. The term “variant” designates orthographic equivalence on the character level, such as that between “æ” and “ae” in “encyclopædia” and “encyclopaedia”, but not in the broader sense that pertains to the variant spelling of words, as “encyclopaedia” vs. “encyclopedia” or “color” vs. “colour”.

An IDN Table will typically contain characters that either represent a specific language, or are taken from a specific script without particular reference to any of the languages that are written with it. The term “IDN Table” as it is used here, corresponds to what in previous contexts was referred to as a “variant table”, a “language variant table”, a “language table”, or a “script table”.

In accordance with the IDNC WG Final Report and consistent with the IDN Guidelines, an IDN Table identified is required for IDN registries. The table must indicate the script(s) or language(s) it is intended to support and any variant characters as defined above must be identified in the table.

The IDNC WG Final Report says that countries and territories using the same script are encouraged to cooperate in developing a language/script table in accordance with the IDN guidelines. Based on the IDNC recommendation and on the input and comments received on this topic, ICANN prepared a paper (Development and use of IDN tables and character variants for second and top level strings) providing proposed implementation details on this subject. The paper provides definitions of IDN Tables and character variants. The benefits to TLD registries that plan to introduce IDNs (either at the second or top level) are described. The paper also proposes an outline for developing an IDN Table and a methodology for how ICANN should use the IDN Tables provided in the criteria for the TLD allocations and management.

The paper is posted in conjunction with this revised Draft Implementation Plan, and comments are sought in preparation for a finalized Implementation Plan.

| Nr | Name and Affiliation | Date | Comment | Staff Consideration |
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| 1 | Avri Doria, Chair GNSO | | The consideration of including identified variant strings along with the IDN TLD applied for is consistent with the recommendation from the GNSO IDN WG that there is a need to cover script-specific character variants of an IDN TLD string and, that measures must be taken to limit confusion and collisions due to variants | Comment noted |
| 2 | Manal Ismail, Egypt GAC Representative | 6 April | Egypt recommends that ICANN establish criteria for submission of the different categories of IDN tables and have a unified format for submission of each category | Further clarification has been attempted on this topic in the revised paper and the draft Implementation Plan. However, it is not fully understood what the difference is between a variant table and a language table is in this example. The intent was to have one table only that also holds the variant identification. |
| 3 | See # 2 | | A registry should be referred to an existing language table prior to submitting a new one for the same language. In case a new table is still needed, ICANN should document the reason and the variation between both tables for future referencing. | Further reference to use existing tables has been attempted in the recently released paper on this topic. Also, the proposal for comparison between tables supporting the same language(s) or script(s) has been taken into account in the current proposed paper. |
| 4 | Ram Mohan Convenor, ASIWG | 6 April | ASIWG supports ICANN's recommendation for collaboration among language communities sharing the same language/script for development of IDN tables. ASIWG recommends defining a clear | In the next version of the topic paper the process for submission of an IDN Table will be described, and as soon as the application web form is ready for public review, this will be even clearer. |

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| | | | process for the submission of these tables to ICANN. | |
| 5 | See # 4 | | ICANN should create appropriate criteria for accepting IDN Tables. ASIWG believes that due diligence must be performed prior to accepting IDN Tables. For instance, has relevant community been solicited for feedback, has there been a consultation with relevant prior work so as to ensure that duplicative effort is reduced and confusion avoided | The practice of how this would work is difficult for staff to envisage, further clarification would be appreciated. |
| 6 | See # 4 | | ASIWG recommends that IDN table submissions should contain two parts, one part which includes the characters which are allowed for the language/script community within the relevant script block, and the second part which includes the relevant variant table(s) | More clarity has been included in the revised paper and the revised Draft Implementation Plan on this topic, while the exact suggestion has not been taken into consideration. |
| 7 | See # 4 | | TLD Registries should be allowed to adopt tables that are agreed upon by language/script community-based expert groups or other competent authorities. ASIWG encourages such groups to publish their tables in well known, open forums such as the IETF. Preference should be given to such documents | ICANN will accept IDN tables from TLD registries on an equal basis and not treat one over the other. This is consistent with the rules in the IANA repository and ICANN's general way of treating parties on an equal basis. |
| 8 | See # 4 | | ICANN should encourage TLD Registries to refer to already accepted IDN tables prior to submitting new IDN tables for the same | This is agreed upon and added clarifications have been made in the revised papers. |

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| | | | language/script/community. | |
| 9 | See # 4 | | Suggestion that ICANN review IDN table submissions for the same language/ script community with earlier accepted IDN tables by other TLDs, and require that where variations exist, the rationale and the variations be documented. | This suggesting has been taken into account. ICANN will compare a new IDN table with any existing IDN table(s), if such exists for the same language(s) or script(s). If a discrepancy is discovered in this review then the submitter of the IDN table will be asked for an explanation. This is a new proposal in the revised topic paper that has been released for public comments |
| 10 | See # 4 | | Recommendation that ICANN publish its repository of IDN tables and make them publicly available for other TLD registries for possible re-use (if needed) | The IANA repository will hold all IDN tables submitted by a TLD registry. For TLD applicants there is a requirement to submit the associated IDN table. ICANN will post such in for the interim on its website, until the applicant has been approved as a TLD registry and the Table can be submitted to the IANA repository. |
| 11 | See # 4 | | TLD Registries should be allowed to submit more than one IDN table to serve different language/script communities. | This is agreed. |
| 12 | Terrence Graham, Afilias | 6 April | ICANN should set a high bar for the acceptance of IDN tables, and ICANN must ensure that some documentary evidence of consultation with the appropriate linguistic community(ies) is provided when submitting IDN Tables | The current process for accepting IDN Tables does not include a review of the content of such tables nor the adequacy of the consultation obtained during the development of the table. while this added bar has |

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| | | | to avoid unnecessary duplication of effort and putting registry operators in the untenable position of having to “pick sides” regarding which table to use. | been discussed it is not clear how ICANN could play a role in approving the development of a table. However, use of existing tables are encouraged to avoid confusion. |
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Proposed Implementation details regarding IDN Tables and Variant Management:

I. Executive Summary

The topics of IDN Tables and variant characters were discussed in several sessions during the ICANN meeting in Cairo, Egypt, November 2008. As a result, some clarifying information was included in an update to the Draft Implementation Plan at <http://www.icann.org/en/announcements/announcement-26nov08-en.htm>

This paper provides additional information on IDN Tables, and why they are beneficial to TLD registries that are planning to introduce IDNs (either at the second or top level). The paper describes, in outline form how an IDN table can be developed, and a methodology for how ICANN will use the IDN Tables provided by registries for the TLD allocations and management. In summary:

- 1. An IDN Table is a tabular listing of all characters that a TLD registry is making available for domain name registration.*
- 2. A TLD registry can have more than one such table, for example one per language. The table can be based on either: a language; set of language; or a script (per the IDN Guidelines).*
- 3. Variant characters are two or more characters that have “the same meaning” when used in domain name registrations.*
- 4. The IDN tables that define variant characters are useful because they reduce the potential for confusion that could result from typographic similarities.*

| Nr | Name and Affiliation | Date | Comment | Staff Consideration |
|-----------|-----------------------------|-------------|---|--|
| 1 | Eric Brunner-Williams | 20 February | Item nr 1 could be qualified, the IDN Table is not a tabular listing of all characters available for some purpose, but a listing of all characters, | Some registries prefer to add the ASCII characters as well. Either way is fine and will be accepted. |

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| | | | other than the ASCII LDH set, from some character repertoire other than the ASCII set. | |
| 2 | See # 1 | | Item nr 4 is incorrect. It places the utility for definition of variant characters in typographic similarities. The utility for recognizing equivalent meanings is not to prevent confusion arising from dissimilar meaning associated with visually similar characters, but to prevent confusion arising from dissimilar meaning associated with visually dissimilar characters. | This has been fixed in the revised version of the Proposed Implementation details Regarding IDN Tables. |
| 3 | See # 1 | | The test for true meaning is either to state that SC/TC and similar character equivalencies are not "variants" and ICANN will discard any SC/TC and similar table data submitted as IDN table data. | ICANN and IANA will not review and approve content of the IDN Tables. The rules around content development stays the same as always has been the case. However, ICANN will compare a new IDN table with any existing IDN table(s), if such exists for the same language(s) or script(s). If a discrepancy is discovered in this review then the submitter of the IDN table will be asked for an explanation. This is a new proposal in the revised topic paper that has been released for public comments. |
| 4 | Manal Ismail Egypt GAC Representative | | As the document refers only to IDN tables and reference to the following statement: "The term "IDN Table" as it is used here, corresponds to what in previous contexts was referred to as a "variant table", a "language | ICANN is attempting with this paper to include the global definition of IDN tables, while informing and accepting that various categories exists. |

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| | | | variant table", a "language table" or a "script table". Egypt recommends that ICANN have clear definitions and distinction between the different categories of IDN tables and that ICANN maintain a categorized repository of IDN tables. | |
| 5 | Terrence Graham, Affilias | 6 April | Suggest that the definition of variants be updated to reflect linguistic and orthographic accuracy | The definition of variant characters is addressed in the updated version of the topic paper on IDN Tables and Variants. |

5. Procedures for the development of IDN tables are proposed in this document. In these procedures applicants are strongly encouraged to collaborate when potential confusion might exist with languages of other countries and territories:

a. Languages/scripts are sometimes shared across geographic boundaries. In some cases this can cause confusion among the users of the corresponding language or script community.

b. Visual confusion can also exist in some instances between different scripts (for example, Greek, Cyrillic and Latin). An IDN Table with cross-dependencies of identified variant characters can limit this confusion in cases when several scripts are used under a TLD.

| Nr | Name and Affiliation | Date | Comment | Staff Consideration |
|-----------|--|-------------|---|----------------------------|
| 1 | Manal Ismail, Egypt GAC Representative | 6 April | Egypt supports statement in paper and strong recommendation to encourage collaboration among communities sharing scripts etc. to develop IDN tables and associated policies | Comment Noted |

6. ICANN's limited role regarding the development of the IDN Tables will be to provide support to applicants when requested.

| Nr | Name and Affiliation | Date | Comment | Staff Consideration |
|----|-----------------------|-------------|---|--|
| 1 | Eric Brunner-Williams | 20 February | What support will ICANN provide to applicants when requested? | If any applicants are in need of linguistic support then ICANN will provide guidance and support for finding the adequate linguistic resources. However, ICANN staff will not in itself provide recommendations about the content of the IDN Table(s). |

7. This paper proposes that ICANN will employ all submitted IDN tables when considering request for top-level strings. The tables will be used as a guide to determine if an applied for string would result in confusion with an existing string. Where user confusion would result from the use of a variant character the applied for string will not be delegated into the root zone.

| Nr | Name and Affiliation | Date | Comment | Staff Consideration |
|----|-----------------------|-------------|------------------------|---|
| 1 | Eric Brunner-Williams | 20 February | This could be restated | The entire proposal around variant management has been modified in the revised topic paper. |

By publishing this paper ICANN is actively soliciting your comments on this important subject. This feedback will play a key role in shaping final implementation plans, intended for presentation at the ICANN meeting in Sydney (June 2009).

II. IDN Table Definition

An IDN Table is a list of all those characters that a particular TLD registry supports beyond the twenty-six letters of the basic Latin alphabet (a-z), ten digits (0-9), and the hyphen (-). If any characters in a table are considered to be variants of each other (essentially meaning “the same as”), this is indicated next to each character in a variant group. The term “variant” designates orthographic equivalence on the character level, such as that between “æ” and “ae” in “encyclöpædia” and “encyclopaedia”, but not in the broader sense that pertains to the variant spelling of words, as “encyclopaedia” vs. “encyclopedia” or “color” vs. “colour”.

An IDN Table will typically contain characters that either represent a specific language, or are taken from a specific script without particular reference to any of the languages that are written with it. The term “IDN Table” as it is used here, corresponds to what in previous contexts was referred to as a “variant table”, a “language variant table”, a “language table”, or a “script table”.

Expertise in linguistics and orthography is required to determine whether a character should be considered a variant of another character, and the same elements of a given script may be regarded differently from language to language. (Referring again to the example of “æ” and

“ae”, in an English language table, the former would likely be treated as a variant form of the latter. In a Danish language table, the “æ” would be a separate letter of the alphabet.) The recommendations here do not change that approach.

| Nr | Name and Affiliation | Date | Comment | Staff Consideration |
|----|--|------------|--|---|
| 1 | Manal Ismail, Egypt GAC Representative | 6 April | Regarding the second paragraph of this section Egypt recommends that an IDN table contain only complete sets of characters of supported languages. | Different communities will have a different understanding of what a complete set is. All ICANN can do is allow TLD registries to create their own list as there is no one list for each language or script that states exactly which characters should be included. |
| 2 | See # 1 | | It is worth noting that some characters within a script table might not be advisable for domain name registrations as per the relevant language community's request, although they are part of the language, for reasons of security risk of implementation. Hence there should be a mechanism to ensure that such recommendations are respected and followed by the registries. | It will be up to the individual TLD registry to develop their table(s), some with local legislation to follow, and provide that to ICANN. ICANN will not review the content to any further extent than as proposed to compare tables and get verification for the reasoning behind discrepancies. |
| 3 | See # 1 | | The document only refers to IDN tables. Egypt recommends that ICANN have clear definitions and distinction between the different categories of IDN tables and that ICANN maintain a categorized repository of IDN tables. | ICANN is attempting with this paper to include the global definition of IDN tables, while informing and accepting that various categories exists. |
| 4 | Ram Mohan Convenor, ASIWG | 6 April | Specify the distinction between the various | This has been modified in the revised paper |

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| | | | <p>kinds of IDN tables. This is particularly significant since ASWIG anticipates that new IDN Table submissions and/or new TLD applications will refer to existing tables, and a specific reference rather than a generic table will be more meaningful.</p> | |
| 5 | See # 4 | | <p>ASIWG believes there at least five categories of IDN Tables: Language Table, Script Table, Multi-Language Table, Multi-Script Single-Language Table and Multi-Script Multi-Language table. These categories will need to be defined. ASIWG is working on these definitions and is willing to share this to ICANN once complete.</p> | <p>ICANN Is looking forward to receiving additional information when available.</p> |
| 6 | See # 4 | | <p>ASIWG believes that completeness of tables should be a requirement prior to acceptance of IDN Tables. More details are provided later in this document.</p> | Se # 1 |
| 7 | Terrence Graham, Affiliations | 6 April | <p>More precision is required in the definition of IDN Tables. The rationale for combining all prior IDN table definitions. It is not clear whether existing “language tables” or other forms in the IANA database will remain reference documents, or will be retired in favor of the new IDN Table</p> | <p>The intent was to have a common terminology. The revised paper will expand on this topic. It is not foreseen that the structure of the IDN tables will change, however the IANA repository has made the listing of the existing tables more easily to understand. The Intent was surely to have all options of tables in the paper, please see if the</p> |

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| | | | structure. The definition does not appear to accommodate languages that use multiple scripts and which might be defined in a single IDN Table. | revised paper is solving this issue. |
| 8 | See # 7 | | Language tables must always be accompanied by a Variant Table. In cases where no variants exist, this should be stated. | The intent with the IDN table definition was to have one table that holds the characters that are supported, and that also identifies variants if such exists. In the updated version of the topic paper this will be further addressed. |

III. The benefit of having IDN Tables

When the number of characters available for inclusion in domain names was expanded from the 37 characters noted earlier to about 100.000 characters from numerous scripts, the potential for confusion resulting from typographic similarities increased dramatically. Even though a computer can, for example, easily recognize the difference between “a” (Latin), “α” (Greek), and “а” (Cyrillic), the human eye cannot. This difficulty is further increased by differences between fonts, the sizes at which they are displayed, and the time required to process and remember the character used.

To reduce this heightened level of potential confusability, (per the IDNC Final report recommendations) a TLD registry’s registration policy for IDNs must include the creation of IDN Table(s); so that a TLD registry’s IDN registration policy is based on a clearly defined set of characters. By using similarly structured IDN Tables TLD registries maintain a comparable basis for indicating the characters made available for registration, and the specific terms that apply to characters that are treated as variants of each other.

While the experience in this field is solely with reference to IDN registrations at second level under existing TLDs, as well as lower-level registrations, the basic concept is applicable to and becomes increasingly important with TLD strings. This ensures that we avoid having confusingly similar strings inserted in the root, in particular confusingly similar strings that are managed by different entities.

Historically IDN Tables have been developed by the TLD registries. And while IANA displays the tables online in a repository to provide a single source of information, ICANN’s IANA function does not validate the content of the tables. That said, the tables do need to fulfill the requirements articulated in the IDN Guidelines and the formatting rules from the IANA IDN

Repository Procedure requirements, in order to be considered IDN Tables. The IDN Guidelines and IANA IDN Repository Procedures will, in turn, be adjusted in response to the outcome of the discussion of the present proposal, and its implementation.

| Nr | Name and Affiliation | Date | Comment | Staff Consideration |
|-----------|-----------------------------|-------------|---|---|
| 1 | Eric Brunner-Williams | 20 February | Statement that the benefits of equivalence only in terms of visual similarity is error. | This has been fixed in the revised version of the Proposed Implementation details Regarding IDN Tables. |

IV. Development of IDN Tables

Depending on the number of characters in an IDN Table, and on which language or script it represents, varying degrees of difficulty will be involved in its development and in identifying the variants it may contain. For example, if a table holds characters from a single script that supports a single language, determining how that speech community regards similarity can be rather simple. However, if the characters in a script that is used to write many languages or if the TLD registry intends to support many languages, it may be more difficult to adequately consider the relevant linguistic elements of all those.

Fundamental differences among writing systems give rise to situations in which a given script element is used differently from language to language, which could confuse someone lacking a detailed understanding of variations in orthographic practices. This situation must be accepted in IDNs precisely as it is in other contexts where written language appears. Nonetheless, the user community will benefit from efforts to minimize the potential for confusion. The prototypical contribution to script-development-based policies serving multiple language communities has resulted in the Joint Engineering Team (JET) Guidelines for Internationalized Domain Names (IDN) Registration and Administration for Chinese, Japanese, and Korean, which can be seen at <http://www.ietf.org/rfc/rfc3743.txt>.

Similar initiatives are under way in language communities sharing other scripts, for example, the Arabic Script IDN Working Group (ASIWG).

The Arabic script is used widely for a number of languages originating in the Middle-East, Africa, and Asia. Each of these language communities will have its own perspectives on the structuring of its IDN Table. The only way to ensure that the interests of every such community are reflected in the way their shared script is manifested in the IDN space, is for them all to take part in the coordinated development of the table(s), whether it is in development of one IDN Table for the script, or several IDN Tables for one or more languages. The alternative is to risk unintentional inconsistencies in the way a given element of a script is treated in different language tables in which it appears, to the disadvantage of all of the language communities sharing that script.

Another example of a similar initiative and a difficult situation is the more than 20 Indian languages that use about 13 scripts, and some of these languages are written with multiple scripts. Although the sizes of the respective language communities differ, no language within the country has a higher formal status than does any other. A common IDN Table, or several IDN Tables prepared in tandem, must consider the relevant linguistic elements from all languages

sharing a script, or where visual confusability is a factor. This approach will ensure that all Indian languages can be supported on an equitable basis.

Regardless of the language or script basis, domain names do not always represent dictionary words, and nothing intrinsic to a label indicates the language or script it is intended to represent. Thus further attention must be given to the way a script is used for writing other languages that may be similarly reflected in IDNs (as the examples here illustrate). Without such action, the language-specific detail adopted by one registry could prove to be at odds with the policies of another registry supporting some other language also written the same script, possibly creating confusion within the broader Internet user community.

| Nr | Name and Affiliation | Date | Comment | Staff Consideration |
|-----------|-----------------------------|-------------|---|--|
| 1 | Eric Brunner-Williams | 20 February | Section IV, para 1 refers to a "speech community". This should be "writing community", or simply "language community", and "language authority or authorities" is even better. | This has been taken into consideration in the revised topic paper. |
| 2 | See # 1 | | The examples used in this section do not include the complete picture or refer to existing rfc's | Many languages and scripts could have been mentioned as examples. The ones mentioned here solely serve as exemplifying some of the work that is ongoing and where particular difficulty exists. There is currently no requirement for an IETF draft for IDN Tables. |
| 3 | See # 1 | | The final paragraph in this section fails to state that domain names are persistent identifiers associated via resolvers using the DNS (rfc1034/35 et seq) to transient resources. There is a problem that many, for instance, the group organized three years ago by the Arab League, view "domain names" as "names" existing in some external universe of "meaningful | The sole purpose is to state that not all words can be expressed, and because of that labels do not contain information about which language or script it is written in/intended to be expressed in. Because of that we need to be more careful about how scripts and languages are treated and used in domain names, to avoid user confusion as much as possible. |

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| | | | names", rather than as unique LDH. This leads to over-specification attempts and suggesting that identifiers nearly always represent words simply props up a misunderstanding that never should have existed, and that is the level of misunderstanding that exists in some of the groups attempting to inform or capture ICANN and the IETF | |
| 4 | Ram Mohan, Convenor ASIWG | 6 April | ICANN should expand its role to document the process regarding the development of IDN Tables, and publish guidelines for IDN Table development. | ICANN's role must remain rather limited as ICANN does not hold the linguistic expertise necessary to review the content in the tables. However, the updated version of the topic paper will include guidance and information around the development of IDN Tables. |
| 5 | Terrence Graham, Affilias | 6 April | The development of the appropriate character set and its variants uses an example that refers to a "speech community". We believe this is in error and should be replaced by "language/script community." | This has been taken into consideration |

Usage of IDN Tables and variant characters in domain name registrations

There are a variety of ways to deal with variant characters in domain name registrations. Short descriptions of those that are most common follow. Which approach a TLD registry will take has historically been decided by the TLD registry alone. The recommendations in this paper do not change that approach and as such the following is provided for informational purposes only.

1. Bulk registrations – the characters that are variants will result in the registrant receiving two or more registrations (the variant domain names) for the same prices and automatically as one.

2. *Blocked registrations – the characters that are variants will result in the blocking of the variant domain name(s). A block of a domain name means that it can never be registered.*

3. *Reserved registrations – the characters that are variants will result in a reservation of the variant domain name(s). A reservation most commonly means that only the registrant can release the reservation and register the domain name in question.*

Proposed IDN Table procedure for SLD registration usage

The IDNC Final Report recommendations require that one or several IDN Tables are made available for any IDN ccTLD Fast Track applications. The IDN Guidelines makes the same observations for registries wishing to provide IDN support in domain name registrations.

The following proposed procedure is put forward to provide some additional clarifications around how IDN Tables can be developed. The proposal is for all TLD registries wishing to support IDNs at the second level.

The primary goal of the following proposal is to ensure that all language communities have an equal opportunity for making their languages available for domain name registration.

1. *The IDN ccTLD fast track requestor decides the characters that will be available for inclusion in SLD labels, seeking at its own discretion the advice and comment from governmental agencies, and its target community.*
2. *The IDN ccTLD fast track requestor assesses the extent to which the characters on the resulting list can also be expected to appear in IDN ccTLD requests submitted by other countries or.*
 - a. *If there is no such likelihood, the requestor will decide if any characters should be listed as variants in its development of the associated IDN Table(s). (It is still recommended that advice be sought from expert linguists that are thoroughly familiar with the language or script).*
 - b. *If the characters are likely to appear in other requests, the requestor should coordinate the development of the IDN Tables(s) and the listing of variant characters with the corresponding action in other countries or territories. This collaboration should decide whether a single character table can be shared or if separate tables are required. This joint effort is the only means to ensure that inadvertent confusion is avoided, and to prepare a narrative explanation for the general user community, of the reasons for any unavoidable ambiguity.*
3. *As the requestor must be able to determine in Item 2) which other countries or territories to collaborate with, as part of the Fast Track process, ICANN will facilitate bringing requestors into contact with bodies having relevant linguistic expertise, if such assistance is needed.*

| Nr | Name and Affiliation | Date | Comment | Staff Consideration |
|-----------|-----------------------------|-------------|------------------------|-----------------------------|
| 1 | Eric Brunner- | 20 | The Statement that the | The Fast Track process is a |

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| | Williams | February | <p>primary goal "primary goal" that "... all language communities have an equal opportunity ... " for the proposal that follows, is misleading in two parts. the Fast Track is not open to "all language communities".</p> <p>Secondly, the goal is not that some language community has formal equity of opportunity with the early-adopter Latin-centric user community, but that the non-Latin scripts are preferentially available to language communities who's orthographic conventions have been included in the current version of the reference character repertoire.</p> | <p>limited round of implementation of IDN TLDs, before the full policy that cater for all communities will be finalized and implemented. This is per community recommendation and as such not a topic for this paper.</p> |
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Proposed IDN Table usage for TLD Registrations

The IDNC Final Report recommendations require that one or several IDN Tables are made available for any IDN ccTLD Fast Track applications. The IDN Guidelines makes the same observations for registries wishing to provide IDN support in domain name registrations.

The characters and variants presented in an IDN Table for SLD registration will also be applied to the top level. ICANN will use these IDN Tables when reviewing requests, and requestors are encouraged to consider this carefully when preparing their IDN Tables and selecting their TLD labels.

There will be situations in which an IDN ccTLD requestor may have reasonable grounds for wishing to have more than one label for the requested domain, which differ either in a detail of encoding that is not readily visible when displayed, or in some more obvious orthographic regard (called "variant strings"). There is, however, currently no standard or mechanism by which such aliasing can be implemented at the root level and the Fast Track Process does not provide for the delegation of multiple labels in the same language and script for a single IDN ccTLD.

ICANN proposes that variant strings be either allocated or blocked for registration, following the logical arguments and requirements here:

a. Variant strings must fulfill the same requirements from the fast-track process as the requested string(s) in order to be allocated.

b. While the IDNC Final Report on the Fast Track process recommended “one string per territory per official language” it was mute on the concept of variant strings.

c. The concept of the number of strings should be expanded to allow various countries and territories to have their variant string(s) allocated. Otherwise the Fast Track Process objectives of meeting community demand would not be met, and it would most likely create unnecessary confusion among certain populations if variant strings were not allowed.

d. The variant strings will be allocated only if it is agreed that they be treated as aliased functions of the requested string.

e. The variant strings will be inserted as separate delegations in the DNS root zone.

f. Since there is no known technical standard or mechanism by which aliasing can be successfully implemented at the root level, requestors must include in their IDN TLD implementations a mechanism for ensuring that aliasing is enforced between the requested string and the identified variant strings.

Variant strings fulfilling these requirements also must be requested by the IDN ccTLD applicants, with a specific focus on:

Variant strings that do not fulfill the above requirements be blocked for allocation in the DNS. This would be in line with practices currently used by TLD managers for IDN second level registrations. Blocked strings will be considered as “existing strings” when incoming applications are checked for conflicts with existing TLDs. Therefore, any later application for the same string will be denied.

As mentioned in the beginning of this paper, ICANN is actively soliciting your comments on this important subject. This feedback will play a key role in shaping final implementation plans, intended for presentation at the ICANN meeting in Sydney (June 2009).

| Nr | Name and Affiliation | Date | Comment | Staff Consideration |
|-----------|-----------------------------|-------------|--|--|
| 1 | Eric Brunner-Williams | 20 February | This section “Proposed IDN Table usage for TLD Registrations, refers to "variant strings" which is not defined or is a roundabout way to refer to the SC/TC mapping problem, and continues to mingle a technical issue, the lack of a standard | This is understood and a topic that needs further exploration. The revised topic paper has a changed recommendation on the topic of variant management which indeed is related to the SC/TC topic. |

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| | | | mechanism for aliasing delegations at the root of a DNS tree, and the policy choice to limit the number of delegations to "one per language per script per IDN ccTLD. | |
| 2 | See # 1 | | The lettered recommendations for proposed IDN table usage at (c) differs from the IDNC Final Report recommendation of "one string per territory per official language" in the area of variant strings. This is an improvement over the IDNC Final Report | See # 1 |
| 3 | See # 1 | | No standard mechanism exists for aliasing delegations in the IANA root(refers to recommendation d in this section), yet the applicant for a variant string must agree to (somehow) effect an identical zone to the zone(s) associated with all other strings in the "variant string set". As a policy this is remarkable. | This has been changed in the revised topic paper. |
| 4 | See # 1 | | Recommendation (e) is a restatement of the reality that there is no alias mechanism available, but it misses a larger opportunity, that more than the incumbent ASCII ccTLD operator, and more than one policy model, are possible for countries with multiple scripts, languages, or even just variations with a difference such | The language requirements and number of strings is clearly specified in the Draft Implementation Plan. The limitations are due to the experimental nature of the fast Track process and in order not to pre-empt the outcome of the ongoing policy for IDN ccTLDs. Also see above in terms of variant management. |

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| | | | as the US-based SC/TC example. | |
| 5 | See # 1 | | The RFI letter did not state that all responses would be held confidential, regardless of the desires of the responding ASCII ccTLD operators and governments, and that the disclosure of strings sought, and the resulting issues, such as the possibility of zero-width joiners or zero-width non-joiners, is still just guesswork. | The RFI letters were designed to establish the level of interest in the Fast Track process. Some of the respondents chose not to make the details of their information public. Details of the responses were posted on 10 February 2009. |
| 6 | Manal Ismail, Egypt GAC Representative | 6 April | Egypt welcomes ICANN's response to community needs, and supports its proposal that variant strings be either allocated or blocked for registration for the same applicant, following the logical arguments and requirements set forth in the document. | This particular topic has been modified in the revised topic paper |
| 7 | Ram Mohan Convenor, ASIWG | 6 April | See # 6, and ASIWG suggests that the variant name(s) applied for should be allocated by default, unless it can be clearly demonstrated that activating the variant form would cause unavoidable confusion. | See # 6 |
| 8 | Terrence Graham, Affilias | 6 April | Number of strings should be expanded to allow various countries and territories to have their variant string(s) allocated. | Comment noted |
| 9 | See # 8 | | Variant strings are | ICANN would appreciate |

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| | | | required to be supported by a statement by an authority in the country or territory. This same authority is also required to attest that the proposed TLD label would not conflict with another TLD label representing another language. | some more discussions on this topic. It is not clear how such a requirement could be verified or function in practise. |
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